



CONSULTING

GVNW CONSULTING, INC.

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REDACTED – FOR PUBLIC INSPECTION

June 27, 2016

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 Twelfth Street S.W.
Room 5-A225
Washington, D.C. 20554

Via ECFS

**RE: FCC FORM 481 – CARRIER ANNUAL REPORTING DATA COLLECTION
CONFIDENTIAL FINANCIAL INFORMATION - SUBJECT TO PROTECTIVE
ORDER BEFORE THE FEDERAL COMMUNICATIONS COMMISSION (FILED
IN DOCKETS 14-58) AND CONFIDENTIAL FINANCIAL INFORMATION
FILED PURSUANT TO SECTIONS .457 AND .459 OF THE FEDERAL
COMMUNICATIONS COMMISSION RULES**

Dear Ms. Dortch,

Stoneham Cooperative Telephone Corporation hereby submits the attached redacted and confidential versions of its “FCC Form 481 – Carrier Annual Reporting Data Collection” financial information pursuant to sections §54.313 and §54.422 of the Commission’s rules, as filed with the Universal Service Administrative Company.

Section 3005 of Form 481 requires the filing of financial information per 47 C.F.R. §54.313(f)(2). Stoneham maintains that this information is “Confidential Financial Information” on the grounds that it is competitively sensitive information which could be used to disadvantage or harm Stoneham and is submitting this information pursuant to Protective Order, DA 16-296 as described below. In addition, Stoneham is requesting confidential treatment pursuant to sections 0.457 and 0.459 of the Commission’s rules for the 2015 Service Quality Improvement Plan Progress Report that is required by section 54.313(a)(1) to be attached to this report. Similar to the financial information submitted under section 54.313(f)(2), the information contained in the 2015 Service Quality Improvement Plan Progress Report contains competitively sensitive information, including but not limited to projected build-out plans and capital expenditures, that is secure from public access that could be used by a competitor to disadvantage or harm Stoneham.

First, Stoneham is submitting the 54.313(f)(2) “Confidential Financial Information” as a “Stamped Confidential Document” with each page bearing the legend CONFIDENTIAL FINANCIAL INFORMATION - SUBJECT TO PROTECTIVE ORDER, BEFORE THE FEDERAL COMMUNICATIONS COMMISSION and also submitting the .457 and .459 “Confidential Financial Information” as a “Stamped Confidential Document” with each page labeled “CONFIDENTIAL FINANCIAL INFORMATION - SUBJECT TO PROTECTIVE ORDER, BEFORE THE FEDERAL COMMUNICATIONS COMMISSION”. One copy of the “Stamped Confidential Document(s)” and accompanying cover letter are enclosed.

Second, Stoneham is submitting the “Stamped Confidential Document(s)” as a “Redacted Confidential Document” where the “Confidential Financial Information” has been redacted. One copy of the “Redacted Confidential Document(s)” and accompanying cover letter with each page labeled “REDACTED - FOR PUBLIC INSPECTION” are being filed through the Commission’s Electronic Comment Filing System (“ECFS”).

FCC Form 481 also will be filed prior to July 1st with the State Commission.

If you have any questions, please contact me at jushio@gvnw.com or 719-594-5814.

Sincerely,

/s/ Judi Ushio

Judi Ushio
Midwest Division Manager

Encl.

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code	462206
<015> Study Area Name	STONEHAM COOP TEL CO
<020> Program Year	2017
<030> Contact Name: Person USAC should contact with questions about this data	Taya Northrup
<035> Contact Telephone Number: Number of the person identified in data line <030>	9707352251 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	stoneham.telephone@yahoo.com
Form Type	54.313 and 54.422

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**(100) Service Quality Improvement Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	462206
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<020>	Program Year	2017
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<039>	Contact Email Address - Email Address of person identified in data line <030>	stoneham.telephone@yahoo.com

<110>	Has your company received its ETC certification from the FCC?	(yes / no)	<input type="radio"/> <input checked="" type="radio"/>
<111>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no)	<input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, please file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

462206co112.pdf

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

<113> Maps detailing progress towards meeting plan targets

<114> Report how much universal service (USF) support was received

<115>

<116>

<117>

<118> Provide an explanation of network improvement targets not met in the prior calendar year.

Yes
Yes
Yes
Yes
Yes
Not Applicable

**(200) Service Outage Reporting (Voice)
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	stoneham.telephone@yahoo.com

<210> For the prior calendar year, were there any reportable voice service outages? No

[illegible]

**(300) Unfulfilled Service Request
Data Collection Form**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	462206
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<039>	Contact Email Address - Email Address of person identified in data line <030>	stoneham.telephone@yahoo.com

<300> Unfulfilled service request (voice)

0

<310> Detail on attempts (voice)

Name of Attached Document

<320> Unfulfilled service request (broadband)

0

<330> Detail on attempts (broadband)

Name of Attached Document

<010>	Study Area Code	462206
<015>	Study Area Name	STONEHAM COOP TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Taya Northrup
<035>	Contact Telephone Number - Number of person identified in data line <030>	9707352251 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	stoneham.telephone@yahoo.com
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed voice	
<410>	Complaints per 1000 customers for fixed voice	0 . 0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed broadband	
<440>	Complaints per 1000 customers for fixed broadband	0 . 0
<450>	Complaints per 1000 customers for mobile broadband	

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<039>	Contact Email Address - Email Address of person identified in data line <030>	stoneham.telephone@yahoo.com
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
462206co510.pdf		
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	

(600) Functionality in Emergency Situations Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<039>	Contact Email Address - Email Address of person identified in data line <030>	stoneham.telephone@yahoo.com
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	462206co610.pdf

**(700) Price Offerings including Voice Rate Data
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010> Study Area Code	462206
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<015>	Study Area Name	STONEHAM COOP TEL CO
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<020>	Program Year	2017
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<030>	Contact Name - Person USAC should contact regarding this data	Taya Northrup
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<035>	Contact Telephone Number - Number of person identified in data line <030>	9707352251 ext.
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<039> Contact Email Address - Email Address of person identified in data line <030> stoneham.telephone@yahoo.com

<701> Residential Local Service Charge Effective Date

1/1/2016

<702> Single State-wide Residential Local Service Charge

16.26

[illegible]

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(710) Broadband Price Offerings
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

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[illegible]

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**(800) Operating Companies
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<035>	Contact Telephone Number - Number of person identified in data line <030>	9707352251 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	stoneham.telephone@yahoo.com
<810>	Reporting Carrier	Stoneham Cooperative Telephone Corporation
<811>	Holding Company	Stoneham Cooperative Telephone Corporation
<812>	Operating Company	Stoneham Cooperative Telephone Corporation

[illegible]

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(900) Tribal Lands Reporting
Data Collection FormFCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

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<035>	Contact Telephone Number - Number of person identified in data line <030>	9707352251 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	stoneham.telephone@yahoo.com

<900> Does the filing entity offer tribal land services? (Y/N) No

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

<921>

- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

**(1000) Voice and Broadband Service Rate Comparability
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	stoneham.telephone@yahoo.com

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance 462206co1010.pdf

Name of Attached Document

<1020> Broadband comparability certification Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance 462206co1030.pdf

Name of Attached Document

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

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<035>	Contact Telephone Number - Number of person identified in data line <030>	9707352251 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	stoneham.telephone@yahoo.com

<1100> Certify whether terrestrial backhaul options exist (Y/N)

Yes

<1130>

(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

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<035>	Contact Telephone Number - Number of person identified in data line <030>	9707352251 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	stoneham.telephone@yahoo.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

462206co1210.pdf

<1220> Link to Public Website

HTTP

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,



<1222> Details on the number of minutes provided as part of the plan,



<1223> Additional charges for toll calls, and rates for each such plan.



(2000) Price Cap Carrier Additional Documentation

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

July 2013

<010>	Study Area Code	462206
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Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- <2010> 2nd Year Certification 47 CFR § 54.313(b)(1)(i) - Note that for the July 1 2016 certification, this applies to Round 2 recipients of Incremental Support
- <2011> 3rd Year Certification 47 CFR § 54.313(b)(1)(ii) - Note that for the July 1 2016 certification, this applies to Round 1 recipients of Incremental Support
- <2022> Recipient certifies, representing year two after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.
- <2023> The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year two - 54.313(b)(2)(ii). Round 2 recipients only.
- <2024A> Round 2 Recipient of Incremental Support?
- <2024B> Attach list of census blocks indicating where funding was spent in year two - 54.313(b)(2)(ii). Round 2 recipients only.
- <2025A> Round 1 or Round 2 Recipient of Incremental Support?
- <2025B> Attach geocoded Information for Phase I milestone reports (Round 1 for year three and Round 2 for year two) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-
- <2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)

Name of Attached Document Listing
Required Information

Name of Attached Document Listing
Required Information

REDACTED - FOR PUBLIC INSPECTION

(2000) Price Cap Carrier Additional Documentation (Continued)**Data Collection Form***Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification support used to build broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017A> Connect America Fund Phase II recipient?

<2017B> Attach information for Phase II - 54.313(e)(1) - list of geocoded locations already meeting the 54.309 public interest obligations at the end of calendar year 2015 and total amount of Phase II support, if any, the price

Name of Attached Document Listing
Required Information

cap carrier used for capital expenditures in 2015.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(2)(ii)

Name of Attached Document Listing
Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(2)(v)

<2020> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 40% of its supported locations in the state on December 31, 2017 - 54.313(e)(3)

<2021> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 60% of its supported locations in the state on December 31, 2018 - 54.313(e)(4)

<2026> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 80% of its supported locations in the state on December 31, 2019 - 54.313(e)(5)

<2027> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 100% of its supported locations in the state on December 31, 2020 - 54.313(e)(6)

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Complete the items below to note compliance with five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

Progress Report on 5 Year Plan		
(3009)	Carrier certifies to 54.313(f)(1)(iii)	
		Yes - Attach Certification
(3010A)	Milestone Certification {47 CFR § 54.313(f)(1)(i)}	
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	No - No New Community Anchors
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No) <input checked="" type="radio"/> <input type="radio"/>
(3014)	If yes, does your company file the RUS annual report	(Yes/No) <input type="radio"/> <input checked="" type="radio"/>
Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:		
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	<input type="checkbox"/>
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No) <input checked="" type="radio"/> <input type="radio"/>
If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:		
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers	<input checked="" type="checkbox"/>
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input checked="" type="checkbox"/>
(3021)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.	<input checked="" type="checkbox"/>
If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:		
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers	<input type="checkbox"/>
(3023)	Underlying information subjected to a review by an independent certified public accountant	<input type="checkbox"/>
(3024)	Underlying information subjected to an officer certification.	<input type="checkbox"/>
(3025)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information

(3005) Rate Of Return Carrier Additional Documentation (Continued)

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

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<039>	Contact Email Address - Email Address of person identified in data line <030>	stoneham.telephone@yahoo.com

Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends

<010>	Study Area Code	462206
<015>	Study Area Name	STONEHAM COOP TEL CO
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<039>	Contact Email Address - Email Address of person identified in data line <030>	stoneham.telephone@yahoo.com

4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission's public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.

Name of Attached Document Listing Required Information

Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.

Name of Attached Document Listing Required Information

4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.

Name of Attached Document Listing Required Information

**Certification - Reporting Carrier
Data Collection Form**

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TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: STONEHAM COOP TEL CO	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/26/2016
Printed name of Authorized Officer: Dewain Shapley	
Title or position of Authorized Officer: Board President	
Telephone number of Authorized Officer: 9707352251 ext.	
Study Area Code of Reporting Carrier: 462206	Filing Due Date for this form: 07/01/2016
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**Certification - Agent / Carrier
Data Collection Form**

 FCC Form 481
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 July 2013

<010> Study Area Code	462206
<015> Study Area Name	STONEHAM COOP TEL CO
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Taya Northrup
<035> Contact Telephone Number - Number of person identified in data line <030>	9707352251 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	stoneham.telephone@yahoo.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: _____	
Name of Reporting Carrier: _____	
Signature of Authorized Officer: _____	Date: _____
Printed name of Authorized Officer: _____	
Title or position of Authorized Officer: _____	
Telephone number of Authorized Officer: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: _____	
Name of Authorized Agent Firm: _____	
Signature of Authorized Agent or Employee of Agent: _____	Date: _____
Name of Authorized Agent Employee: _____	
Title or position of Authorized Agent or Employee of Agent: _____	
Telephone number of Authorized Agent or Employee of Agent: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

(700) Price Offerings including Voice Rate Data Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

July 2013

<701>	Residential Local Service Charge Effective Date	1/1/2016
<702>	Single State-wide Residential Local Service Charge	16.26

[illegible]

REDACTED - FOR PUBLIC INSPECTION

(710) Broadband Price Offerings Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<015>	Study Area Name	STONEHAM COOP TEL CO
-------	-----------------	----------------------

<030>	Contact Name - Person USAC should contact regarding this data	Taya Northrup
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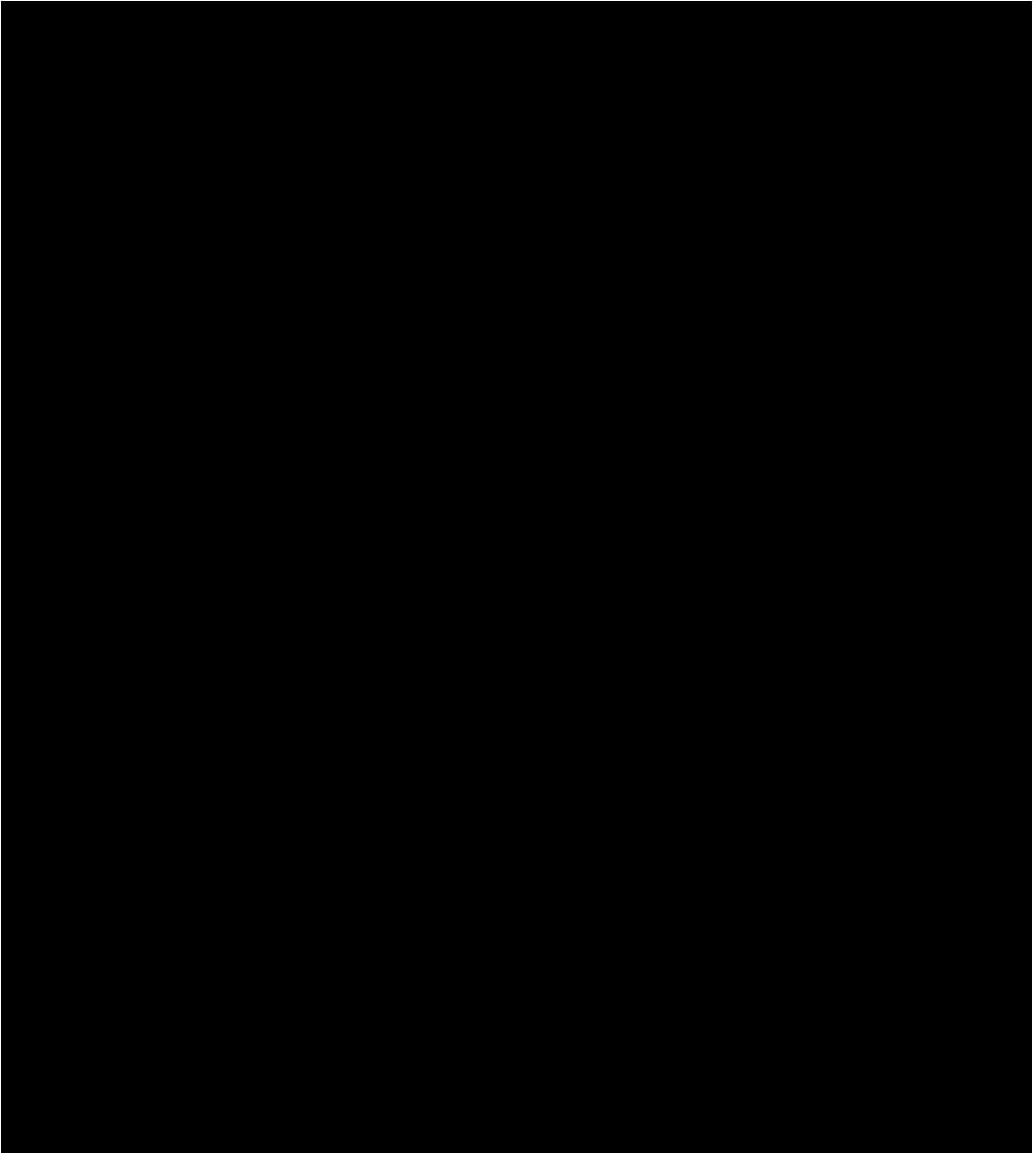
<039> Contact Email Address - Email Address of person identified in data line <030> stoneham.telephone@yahoo.com

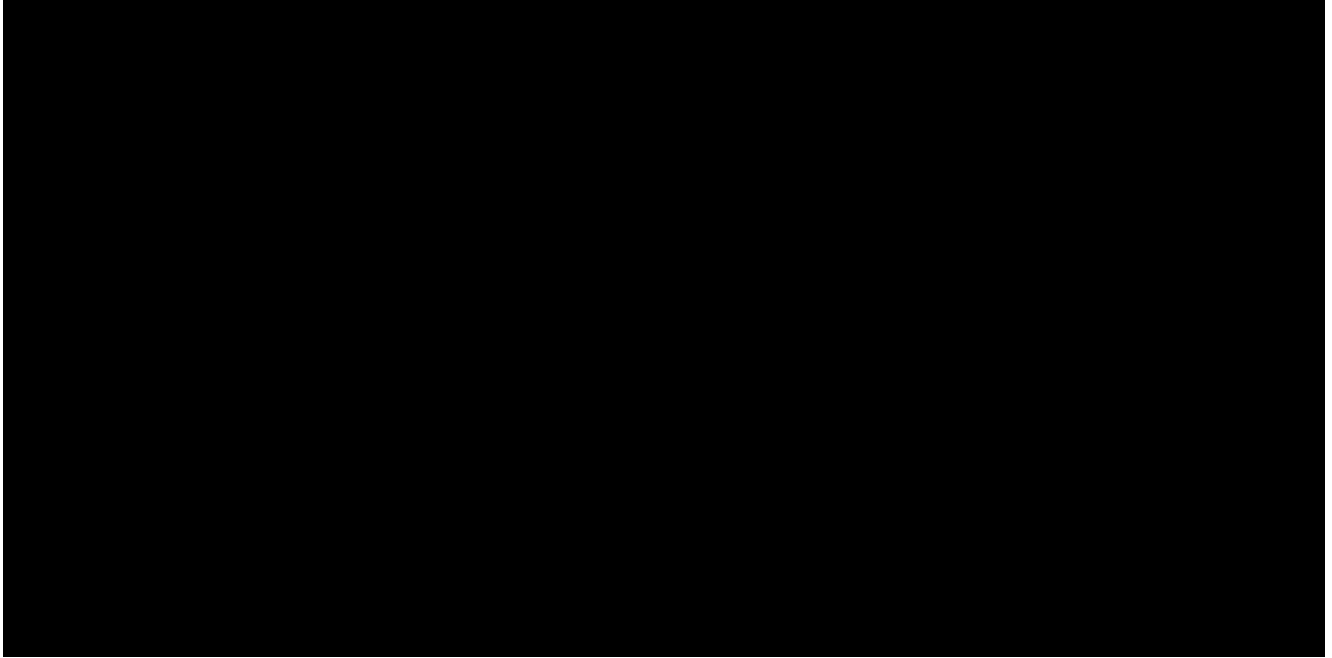
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[illegible]

REDACTED - FOR PUBLIC INSPECTION

2016
PROGRESS REPORT ON QUALITY IMPROVEMENT PLAN



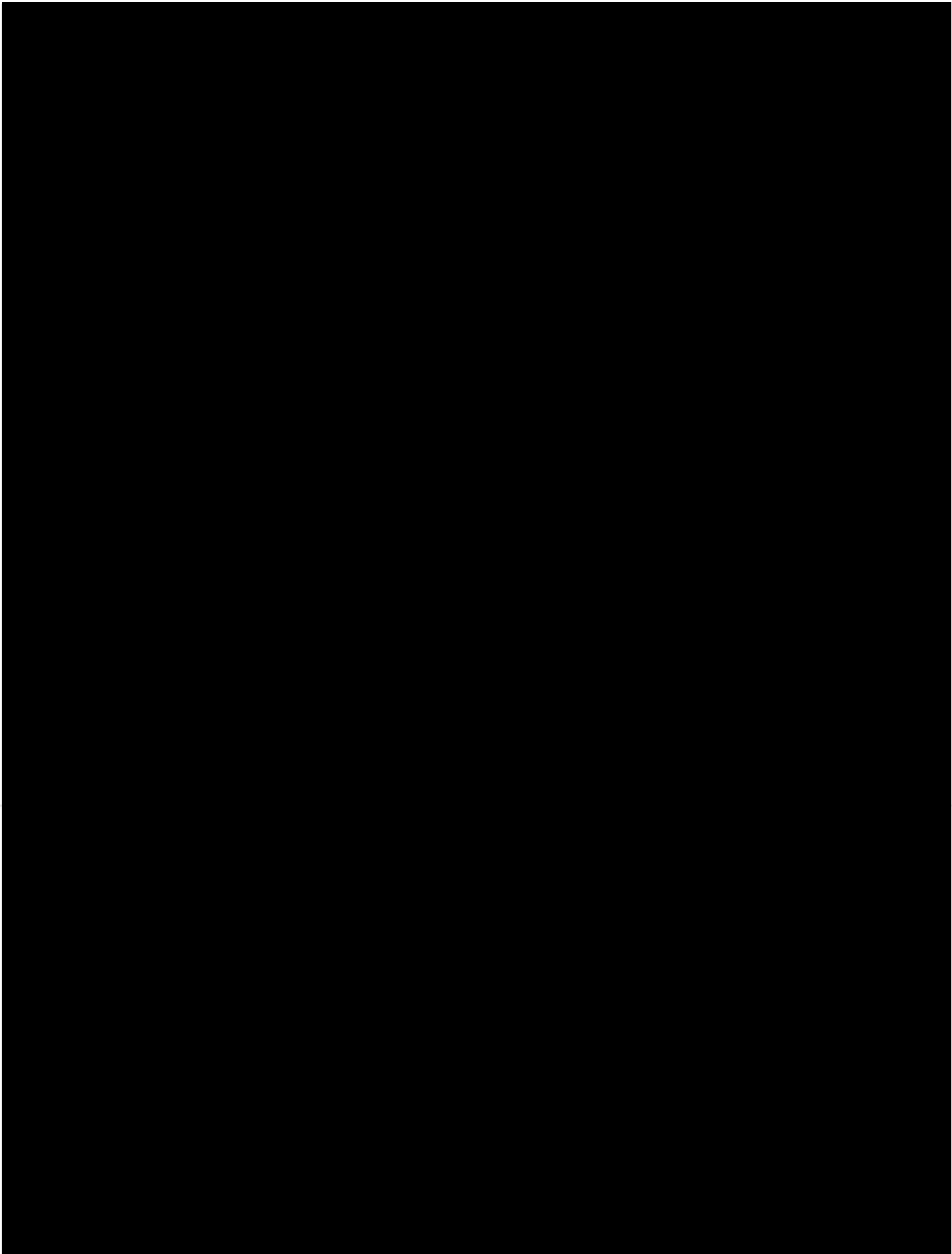


The Stoneham Cooperative Telephone Corporation
NETWORK IMPROVEMENT PROJECTS-PROGRESS REPORT
AS OF 2016 ANNUAL REPORT SUBMISSION - JULY 1, 2016

WIRE CENTER NAME & CLLI	DESCRIPTION of IMPROVEMENT	PURPOSE	COST ESTIMATE	ACTUAL COST	REGULATED % ALLOCATION	AMOUNT IN USF SUPPORT AREA	% VOICE	% BROADBAND	AREA IMPACTED	POPULATION IMPACTED	TARGET COMPLETION DATE	ACTUAL COMPLETION DATE
A	B		C	D	E	F=CxE	***	***	***	***	***	***
2015 [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]

[REDACTED]



- Exchange Cable
- Central Office
- ▨ Area Capable of 10/1 Mbps
- Mbps □ 2010 Census Blocks
- Exchange Boundary

THE STONHAM COOPERATIVE TELEPHONE CORPORATION			
CO 1109			
FIVE YEAR PLAN PROGRESS REPORT			
RYV, Inc.		COLUMBUS, NEBRASKA	
DRAWN	AJN	APPROVED	
CHECKED		DATE	5-25-18

REDACTED - FOR PUBLIC INSPECTION

Line 510 - Service Quality Standards & Consumer Protection Rules Compliance:Consumer ProtectionVoice and Broadband

Stoneham Cooperative Telephone (Stoneham) complies with the requirements of 47CFR Part 64 Subpart U, Customer Proprietary Network Information and the Federal Trade Commission Red Flag Rules to prevent identity threat. A manual for each of those programs is in place and is part of the Company's handbook. Employee and Board of Directors training is conducted annually and new hires are instructed on the programs as required by their job functions.

Service Quality StandardsVoice

The Company complies with the service quality standards and consumer protection rules set forth by the Colorado Public Utilities Commission, and within its rules and regulations as it relates to Service Quality Standards and Consumer Protection Rules. Stoneham is committed to providing the highest quality service to its customers.

Broadband

Stoneham follows the service standards noted in NECA Tariff #5 and is committed to provide the highest quality service to its broadband customers.

The Stoneham Cooperative Telephone Corporation
Ability to Remain Functional in Emergency Situations

1. The Stoneham Cooperative Telephone Corporation (SCTC) has been providing high quality service in Colorado since 1954. This includes operating in adverse conditions including blizzards, ice storms, thunderstorms, tornadoes and during prolonged power outages. SCTC's management team, plant supervisors, plant technicians and customer service representatives have the training, experience and equipment necessary to respond to, manage and operate in emergency situations.
2. The Stoneham Cooperative Telephone Corporation follows applicable Rural Utilities Service (RUS) Telecommunications program practices and guidelines including the Telecommunications Engineering and Construction Manual (TE&CM) and other industry standards available to small telecommunications carriers. The Stoneham Cooperative Telephone Corporation also meets the requirements of the Colorado Public Utility Commission (CPUC) as applied to local exchange service.
3. Back-Up Power

3.1. Central Office

- 3.1.1. The Stoneham Cooperative Telephone Corporation maintains storage batteries designed to provide a reserve capacity of 8 hours. This is consistent with Title 4, CCR 723-2 "Rules Regulating Telecommunications Service Providers, Services and Products", Section 2308 (a) (XII), Rule 2335 The Provision of Service During Maintenance or Emergencies. Sub-paragraph (b) of Rule 2335 requires a minimum of 4 hours of reserve capacity. This is also consistent with "RUS TE&CM 1751E-302, Power Requirements for Digital Central Office Equipment."
- 3.1.2. The Stoneham Cooperative Telephone Corporation also maintains a dedicated standby generator fueled with a 500 gallon reserve supply of liquid propane gas (LPG). The standby unit is equipped with an automatic transfer switch so that in the event of an interruption of the commercial electric power lasting more than a few minutes, the standby generator starts automatically and provides electrical power to the central office equipment, air conditioning and building lighting. The automatic transfer switch also exercises the standby unit periodically and an alarm indication is sent if the standby generator does not start so that telecommunications personnel can perform proactive maintenance.

The Stoneham Cooperative Telephone Corporation
Ability to Remain Functional in Emergency Situations

3.2. Optical Network Terminations (ONT's)

3.2.1. Fiber-to-the-Premises (FTTP) technology has been deployed and the ONT's are powered by micro-uninterruptable power supplies (UPS) located on the customer premises and powered from the customer's commercial electrical power. The UPS batteries are specified for a minimum of eight hours of reserve capacity. The FTTP electronics system monitors the ONT's and notifies SCTC's maintenance personnel when any ONT's batteries are no longer capable of holding the charge required for the designed battery reserve capacity so that SCTC can work with the customer to replace the UPS batteries. SCTC also maintains a cache of UPS's for routine and emergency replacement.

4. Rerouting Traffic around Damaged Facilities

4.1. In the event of damage to cable facilities owned by The Stoneham Cooperative Telephone Corporation, our maintenance personnel would restore service using emergency splice kits kept on hand for these types of service disruptions. If the damaged facilities are not owned by The Stoneham Cooperative Telephone Corporation we would work with the carrier directly affected to identify the source of disruption and the estimated amount of time before service is restored.

4.2. The Stoneham Cooperative Telephone Corporation currently has diverse toll routes in service. Both routes are used to support toll calling as well as critical circuits such as 911 trunks and SS7 A-links. Every effort is made to groom the circuits over the diverse toll routes so that a single outage does not isolate customers from critical services.

4.3. In the event of an extended outage, contact would be made with another service provider which has a separate, physical cable connection with SCTC to provision temporary alternate routes supporting originating and terminating toll calls. Emphasis would first be placed on establishing connections to nearby PSAP, law-enforcement and emergency services.

The Stoneham Cooperative Telephone Corporation
Ability to Remain Functional in Emergency Situations

5. Managing Traffic Spikes

- 5.1. The Stoneham Cooperative Telephone Corporation meets Title 4, CCR 723-2 “Rules Regulating Telecommunications Service Providers, Services and Products”, Section 2308 (a) (XII), Rule 2336 “Adequacy of Service”. for sufficient central office capacity and equipment during the “...average busy hour-busy season...”
- 5.2. The Stoneham Cooperative Telephone Corporation follows applicable RUS practices 522 and 322 when specifying, administering, and assigning facilities within its control (as opposed to facilities ordered by connecting interexchange carriers).
- 5.3. The Stoneham central office switch is a Redcom HDX operating at the Verson 4.0 firmware release. The Stoneham HDX is equipped with 90 access lines. The HDX is designed to support up to 4096 non-blocking ports by adding additional equipment. In its current configuration the Stoneham HDX has additional capacity over and above the minimums specified to meet CPUC and RUS guidelines.
- 5.4. When traffic volumes greatly exceed specified criteria and additional capacity of the switch or connecting facilities, the HDX continues to process calls but with potentially longer waiting times for dial tone, higher post-dialing delays and a higher probability of callers receiving all trunks busy indications (fast busy) and having to redial calls. Depending on the magnitude and duration of extreme peak demand, SCTC would examine alternatives such as provisioning additional facilities and work with connecting carriers to expedite additional capacity.

Voice Services Rate Comparability

As evidenced by the data provided in line 700 of this Form 481, Stoneham's voice service pricing is no more than 2 standard deviations above the national average urban rate (\$47.48) as announced by the Wireline Competition Bureau on April 16, 2015 (DA 15-470)

The Stoneham Cooperative Telephone Corporation

Broadband Services Rate Comparability

Stoneham's Broadband Services pricing meets the FCC's broadband public interest obligations because it offers broadband service as shown on Line 710 of its Form 481 filing, at actual speeds of at least 10 Mbps downstream / 1 Mbps upstream at no more than the applicable benchmark for broadband services announced by the Bureau on April 16, 2015 (DA15-470).

STONEHAM COOPERATIVE TELEPHONE CORP.COLO PUC NO. 2

Name of Utility

2nd Revised Sheet No. 27A

State of Colorado

Cancels 1st Revised Sheet No. 27ALOW-INCOME TELEPHONE ASSISTANCE PROGRAMS (CONT'D)

LOW-INCOME TELEPHONE ASSISTANCE PROGRAM (Continued)

(C)

CONDITIONS (Continued)

Toll blocking, as described elsewhere in this tariff, is available at no charge to a qualifying low-income customer. Toll blocking becomes a part of a low-income customer's service, when subscribed.

Toll control, as described elsewhere in this tariff, is available at no charge to a qualifying low-income customer. Toll control becomes a part of a low-income customer's service, when subscribed.

Toll limitation, which denotes both toll blocking and toll control, is available to a qualifying low-income customer.

If a qualifying low-income customer voluntarily elects toll blocking service from the Company, where that service is available, the customer will not be required to pay a deposit, if otherwise applicable, to initiate service. If toll blocking service is not available, a deposit will be charged, if applicable.

The Company will file information with the Lifeline Administrator demonstrating that the Lifeline plan meets the criteria set forth in Title 47, C.F.R, Subpart E of Part 54, and stating the number of low-income consumers and the amount of state assistance, pursuant to Section 54.401(d) of those rules.

RATES

Rates for qualifying low-income ("Lifeline") customers are specified on Sheet No. 20 preceding.

Lifeline, Link Up, and Toll Limitation Service support provide discounts to eligible low-income consumers to help them establish and maintain telephone service. **Note:**

Telecommunications carriers cannot charge a Lifeline customer federal USF fees on the local service portion of their telephone bill.

What type of discount is available?

Lifeline assistance lowers the cost of basic, monthly local telephone service. Eligible consumers can receive up to \$13.50 per month in discounts.

Eligible residents of Indian reservations or tribal lands can receive up to an additional \$25 in Lifeline support, but must pay at least \$1 for basic monthly service.

Link Up reduces the cost of initiating new telephone service. Eligible consumers can receive a 50% discount off of the one-time costs associated with initiating telephone service, up to a maximum of \$30. Eligible consumers also qualify for a deferred payment schedule for remaining costs of up to \$200.

Eligible low-income consumers living on tribal lands are eligible for an additional discount of up to \$70 to cover 100% of the charges between \$60 and \$130.

Toll Limitation Service (TLS) support allows eligible consumers who wish to avoid incurring large long distance fees to choose toll blocking or toll control at no cost.

How do I know whether I am eligible?

Eligibility for Lifeline, Link Up, and TLS support *varies by state*. Individuals who reside in states that have their own discount programs qualify for federal Lifeline, Link Up, and TLS support if they meet the eligibility criteria established by their state. In Colorado, an individual is eligible if he or she participates in one of the following programs:

Old Age Pension benefits (OAP),

Aid to the Needy Disabled (AND),

Aid to the Blind (AB),

Supplemental Security Income (SSI),

Colorado Works/Temporary Assistance to Needy Families (TANF)

Low-Income Energy Assistance Program (LEAP).

How do I apply to receive Lifeline, Link Up, and TLS support discounts?

To apply for Lifeline, Link Up, and TLS discounts please call the Stoneham Cooperative Telephone Corporation business office at (970) 735-2251.

The Stoneham Cooperative Telephone Corporation Lifeline

54.313 Lifeline customers MOU and additional toll charges

Lifeline subscribers receive the same residential service as a regular subscriber, but at a reduced monthly recurring rate. Thus, lifeline subscribers have an unlimited number of local calling minutes. As for toll, lifeline subscribers, similar to every Stoneham subscriber, are free to choose their own toll usage plans through IXC's that serve Stoneham.

STONEHAM COOPERATIVE TELEPHONE CORPORATION

P.O. Box 56
Stoneham, Colorado 80754-0056

Phone (970) 735-2251
Fax (970) 735-2251

June 1, 2016

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
9300 East Hampton Drive
Capitol Heights, MD 20743

Re: WC Docket No. 14-58, 2015 Annual Report, Form 481 for High-Cost Recipient 54.313(f)(1)
"Milestone Certification"

Dear Ms. Dortch:

In compliance with the filing requirements associated with, and attached to Form 481, we wish to advise the Commission that Stoneham Cooperative Telephone Corporation provides High Speed Internet service to its customers and:

- Has taken reasonable steps to provide upon reasonable request broadband service at actual speeds of 10 Mbps downstream / 1 Mbps upstream;
- Provides latency suitable for real-time applications including VoIP and usage capacity which is reasonably comparable to those in urban areas and;
- That reasonable requests for service are met within a reasonable timeframe.

If there are questions, I may be contacted at 970-735-2251

Sincerely,



Dewain L. Shapley
Board President

(3005a) Operating Report for Privately-Held Rate of Return Carriers

FCC Form 481

Balance Sheet - Data Collection Form

OMB Control No. 3060-0986

OMB Control No. 3060-0819

Page 1 of 3

July 2016

<010> Study Area Code

<015> Study Area Name

The Stoneham Cooperative Telephone Corporation

<020> Program Year

2015

<030> Contact Name - Person USAC should contact regarding this data

<035> Contact Telephone Number - Number of person identified in data line <030>

<039> Contact Email Address - Email Address of person identified in data line <030>

Filed as reviewed single company

Filed as reviewed consolidated company

Filed as subsidiary of reviewed consolidated company

Filed as audited single company

Filed as audited consolidated company

Filed as subsidiary of audited consolidated company

X

CERTIFICATION

We hereby certify that the entries in this report are in accordance with the accounts and other records of the system and reflect the status of the system to the best of our knowledge and belief.

Signature

Date

PART A. BALANCE SHEET

ASSETS	BALANCE PRIOR YEAR	BALANCE END OF PERIOD	LIABILITIES AND STOCKHOLDERS' EQUITY	BALANCE PRIOR YEAR	BALANCE END OF PERIOD
CURRENT ASSETS			CURRENT LIABILITIES		
1. Cash and Equivalents			25. Accounts Payable		
2. Cash-RUS Construction Fund			26. Notes Payable		
3. Affiliates:			27. Advance Billings and Payments		
a. Telecom, Accounts Receivable			28. Customer Deposits		
b. Other Accounts Receivable			29. Current Mat. L/T Debt		
c. Notes Receivable			30. Current Mat. L/T Debt-Rur. Dev.		
4. Non-Affiliates:			31. Current Mat.-Capital Leases		
a. Telecom, Accounts Receivable			32. Income Taxes Accrued		
b. Other Accounts Receivable			33. Other Taxes Accrued		
c. Notes Receivable			34. Other Current Liabilities		
5. Interest and Dividends Receivable			35. Total Current Liabilities (25 thru 34)		
6. Material-Regulated			LONG-TERM DEBT		
7. Material-Nonregulated			36. Funded Debt-RUS Notes		
8. Prepayments			37. Funded Debt-RTB Notes		
9. Other Current Assets			38. Funded Debt-FFB Notes		
10. Total Current Assets (1 Thru 9)			39. Funded Debt-Other		
			40. Funded Debt-Rural Develop. Loan		
NONCURRENT ASSETS			41. Premium (Discount) on L/T Debt		
11. Investment in Affiliated Companies			42. Recquired Debt		
a. Rural Development			43. Obligations Under Capital Lease		
b. Nonrural Development			44. Adv. From Affiliated Companies		
12. Other Investments			45. Other Long-Term Debt		
a. Rural Development			46. Total Long-Term Debt (36 thru 45)		
b. Nonrural Development			OTHER LIAB. & DEF. CREDITS		
13. Nonregulated Investments			47. Other Long-Term Liabilities		
14. Other Noncurrent Assets			48. Other Deferred Credits		
15. Deferred Charges			49. Other Jurisdictional Differences		
16. Jurisdictional Differences			50. Total Other Liabilities and Deferred Credits (47 thru 49)		
17. Total Noncurrent Assets (11 thru 16)			EQUITY		
			51. Cap. Stock Outstanding & Subscribed		
PLANT, PROPERTY, AND EQUIPMENT			52. Additional Paid-in-Capital		
18. Telecom, Plant-in-Service			53. Treasury Stock		
19. Property Held for Future Use			54. Membership and Cap. Certificates		
20. Plant Under Construction			55. Other Capital		
21. Plant Adj., Nonop. Plant & Goodwill			56. Patronage Capital Credits		
22. Less Accumulated Depreciation			57. Retained Earnings or Margins		
23. Net Plant (18 thru 21 less 22)			58. Total Equity (51 thru 57)		
24. TOTAL ASSETS (10+17+23)			59. TOTAL LIABILITIES AND EQUITY (35+46+50+58)		

THESE STATEMENTS HAVE BEEN PREPARED IN ACCORDANCE WITH THE FORM PRESCRIBED BY THE FEDERAL COMMUNICATIONS COMMISSION (FCC) AND NO ASSURANCE IS PROVIDED

REDACTED - FOR PUBLIC INSPECTION

(3005b) Operating Report for Privately-Held Rate of Return Carriers
Income Statement - Data Collection Form

FCC Form 481
OMB Control No. 3060-0986
OMB Control No. 3060-0819
July 2016

Page 2 of 3

<010> Study Area Code

<015> Study Area NameThe Stoneham Cooperative Telephone Corporation

<020> Program Year2015

<030> Contact Name - Person USAC should contact regarding this data

<035> Contact Telephone Number - Number of person identified in data line <030>

<039> Contact Email Address - Email Address of person identified in data line <030>

PART B. STATEMENTS OF INCOME AND RETAINED EARNINGS OR MARGINS		
ITEM	PRIOR YEAR	THIS YEAR
1. Local Network Services Revenues	<div></div>	
2. Network Access Services Revenues		
3. Long Distance Network Services Revenues		
4. Carrier Billing and Collection Revenues		
5. Miscellaneous Revenues		
6. Uncollectible Revenues		
7. Net Operating Revenues (1 thru 5 less 6)		
8. Plant Specific Operations Expense		
9. Plant Nonspecific Operations Expense (Excluding Depreciation & Amortization)		
10. Depreciation Expense		
11. Amortization Expense		
12. Customer Operations Expense		
13. Corporate Operations Expense		
14. Total Operating Expenses (8 thru 13)		
15. Operating Income or Margins (7 less 14)		
16. Other Operating Income and Expenses		
17. State and Local Taxes		
18. Federal Income Taxes		
19. Other Taxes		
20. Total Operating Taxes (17+18+19)		
21. Net Operating Income or Margins (15+16-20)		
22. Interest on Funded Debt		
23. Interest Expense - Capital Leases		
24. Other Interest Expense		
25. Allowance for Funds Used During Construction		
26. Total Fixed Charges (22+23+24-25)		
27. Nonoperating Net Income		
28. Extraordinary Items		
29. Jurisdictional Differences		
30. Nonregulated Net Income		
31. Total Net Income or margins (21+27+28+29+30-26)		
32. Total Taxes Based on Income		
33. Retained Earnings or Margins Beginning-of-Year		
34. Miscellaneous Credits Year-to-Date		
35. Dividends Declared (Common)		
36. Dividends Declared (Preferred)		
37. Other Debits Year-to-Date		
38. Transfers to Patronage Capital		
39. Retained Earnings or Margins end-of-Period [(31+33+34)-(35+36+37+38)]		
40. Patronage Capital Beginning-of-Year		
41. Transfers to Patronage Capital		
42. Patronage Capital Credits Retired		
43. Patronage Capital End-of-Year (40+41-42)		
44. Annual Debt Service Payments		
45. Cash Ratio [(14+20-10-11)/7]		
46. Operating Accrual Ratio [(14+20+26)/7]		
47. TIER [(31+26)/26]		
48. DSCR [(31+26+10+11)/44]		

THESE STATEMENTS HAVE BEEN PREPARED IN ACCORDANCE WITH THE FORM PRESCRIBED BY THE FEDERAL COMMUNICATIONS COMMISSION (FCC) AND NO ASSURANCE IS PROVIDED

(3005c) Operating Report for Privately-Held Rate of Return Carriers
Cash Flow - Data Collection Form

 FCC Form 481
 OMB Control No. 3060-0986
 OMB Control No. 3060-0819
 July 2016

Page 3 of 3

<010> Study Area Code

<015> Study Area Name The Stoneham Cooperative Telephone Corporation

<020> Program Year 2015

<030> Contact Name - Person USAC should contact regarding this data

<035> Contact Telephone Number - Number of person identified in data line <030>

<039> Contact Email Address - Email Address of person identified in data line <030>

PART C. STATEMENTS OF CASH FLOWS

1. Beginning Cash (Cash and Equivalents plus RUS Construction Fund)		
CASH FLOWS FROM OPERATING ACTIVITIES		
2. Net Income		
Adjustments to Reconcile Net Income to Net Cash Provided by Operating Activities		
3. Add: Depreciation		
4. Add: Amortization		
5. Other (Explain) - Equity in earnings of non-affiliate		
Changes in Operating Assets and Liabilities		
6. Decrease/(Increase) in Accounts Receivable		
7. Decrease/(Increase) in Materials and Inventory		
8. Decrease/(Increase) in Prepayments and Deferred Charges		
9. Decrease/(Increase) in Other Current Assets		
10. Increase/(Decrease) in Accounts Payable		
11. Increase/(Decrease) in Advance Billings & Payments		
12. Increase/(Decrease) in Other Current Liabilities		
13. Net Cash Provided/(Used) by Operations		
CASH FLOWS FROM FINANCING ACTIVITIES		
14. Decrease/(Increase) in Notes Receivable		
15. Increase/(Decrease) in Notes Payable		
16. Increase/(Decrease) in Customer Deposits		
17. Net Increase/(Decrease) in Long Term Debt (Including Current Maturities)		
18. Increase/(Decrease) in Other Liabilities & Deferred Credits		
19. Increase/(Decrease) in Capital Stock, Paid-in Capital, Membership and Capital Certificates & Other Capital		
20. Less: Payment of Dividends		
21. Less: Patronage Capital Credits Retired		
22. Other (Explain)		
23. Net Cash Provided/(Used) by Financing Activities		
CASH FLOWS FROM INVESTING ACTIVITIES		
24. Net Capital Expenditures (Property, Plant & Equipment)		
25. Other Long-Term Investments		
26. Other Noncurrent Assets & Jurisdictional Differences		
27. Other (Explain) - Purchases of investments		
28. Net Cash Provided/(Used) by Investing Activities		
29. Net Increase/(Decrease) in Cash		
30. Ending Cash		

THESE STATEMENTS HAVE BEEN PREPARED IN ACCORDANCE WITH THE FORM PRESCRIBED BY THE FEDERAL COMMUNICATIONS COMMISSION (FCC) AND NO ASSURANCE IS PROVIDED

REDACTED - FOR PUBLIC INSPECTION



To the Board of Directors
Stoneham Cooperative Telephone Corporation
Stoneham, Colorado

We have audited the financial statements of Stoneham Cooperative Telephone Corporation as of and for the year ended December 31, 2015, and have issued our report thereon dated March 21, 2016. Professional standards and the Rural Development Utilities Program's (RDUP) Policy on Audits of RDUP Borrowers (7 CFR 1773.20) require that we provide you with information about our responsibilities under generally accepted auditing standards, as well as certain information related to the planned scope and timing of our audit. We have communicated such information to you in our engagement letter dated October 8, 2015. Professional standards also require that we communicate to you the following information related to our audit.

